

KEVIN G. HORBATIUK (KGH-4977)  
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Attorneys for Defendant  
**CUNNINGHAM DUCT WORK s/h/i/a**  
**CUNNINGHAM DUCT CLEANING CO., INC.**  
26 Broadway - 28th Floor  
New York, New York 10004  
(212) 482-0001

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**IN RE COMBINED WORLD TRADE CENTER  
AND LOWER MANHATTAN DISASTER SITE  
LITIGATION**  
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**21 MC 102 (AKH)**

**JULIA NARVAEZ,**

**DOCKET NO.:  
07 CV 5304**

**Plaintiffs,**

**-against-**

**100 CHURCH, LLC, 90 CHURCH STREET  
LIMITED PARTNERSHIP, AMBIENT GROUP  
INC., BELFOR USA GROUP, INC., BFP ONE  
LIBERTY PLAZA CO., LLC BLACKMON-  
MOORING STEAMATIC CATASTOPHE, INC., d/b/a  
BMS CAT, BOSTON PROPERTIES, INC., BROOKFIELD  
FINANCIAL PROPERTIES, INC., CDL NEW YORK  
LLC., CUNNINGHAM DUCT CLEANING  
CO., INC., GENERAL RE SERVICES CORP., GPS  
ENVIRONMENTAL CONSULTANTS, INC., HILLMAN  
ENVIRONMENTAL GROUP, LLC INDOOR AIR  
PROFESSIONALS, INC., INDOOR ENVIRONMENTAL  
TECHNOLOGY, INC., LAW ENGINEERING P.C,  
MERRILL LYNCH & CO., INC.,  
NATIONAL ASSOCIATION OF SECURITIES  
DEALERS, INC., NEW LIBERTY PLAZA, LP.,  
NEW YORK CITY INDUSTRIAL DEVELOPMENT  
AGENCY, NEW YORK CITY INDUSTRIAL  
DEVELOPMENT CORPORATION, ONE LIBERTY  
PLAZA, ROYAL AND SUNALLIANCE INSURANCE  
GROUP, PLC., STRUCTURE TONE (UK), INC.,  
STRUCTURE TONE GLOBAL SERVICES, INC.,  
THE BOARD OF MANAGERS OF THE ONE  
LIBERTY PLAZA CONDOMINIUM (CONDO # 1178),**

**NOTICE OF  
ADOPTION OF  
ANSWER TO  
MASTER COMPLAINT**

**THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178)  
TRC ENGINEERS, INC., WFP ONE LIBERTY  
PLAZA CO., L.P., WFP ONE LIBERTY PLAZA CO.,  
G.P., CORP., WORLD FINANCIAL PROPERTIES,  
L.P., and ZAR REALTY MANAGEMENT CORP., ET AL.**

**Defendants.**

.....X

PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
January 9, 2008

Kevin G. Horbatiuk  
Kevin G. Horbatiuk (KGH4977)  
Attorneys for Defendant  
**CUNNINGHAM DUCT WORK s/h/i/a**  
**CUNNINGHAM DUCT CLEANING CO., INC.**  
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RKT File No. 824.078

TO: CHRISTOPHER R. LaPOLA, ESQ.,  
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CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 9th day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,  
WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
Attorney for Plaintiff  
**JULIA NARVAEZ**  
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KEVIN G. HORBATIUK